



THE CITY OF NEW YORK
LAW DEPARTMENT
100 Church Street
NEW YORK, NY 10007

MURIEL GOODE-TRUFANT
Corporation Counsel

JOSEPH ZANGRILLI
Phone: (212) 356-2657
Fax: (212) 356-3509
jzangril@law.nyc.gov
Senior Counsel

March 12, 2025

BY ECF

Honorable Barbara Moses
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Peter Rodriguez v. City of New York, et al.,
20 Civ. 9840 (JHR) (BCM)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing the City of New York, Captain Shaday Gibson, Captain Bonar Moise, Correction Officer Temir Williams, and Correction Officer Peter Ferraro in the above referenced matter.

In accordance with the Court's Order dated March 3, 2025 (ECF No. 162), I write to submit the following documents as directed by the Court:

1. The complete transcript of plaintiff's September 13, 2022 deposition, docketed above at ECF No. 164;
2. Copies of all written interrogatory answers and Request for Admission responses served on plaintiff by defendants, annexed to this letter as Exhibits, which include:
 - a. Defendants' Responses and Objections to Plaintiff's Local Civil Rule 33.2 Interrogatories and Request for Production of Documents, dated March 19, 2021
 - b. Defendants' Responses and Objections to Plaintiff's Requests to Admit and Requests for Production, dated September 16, 2022
 - c. Defendants' Supplemental Responses and Objections to Plaintiff's Requests to Admit, dated October 26, 2022

3. Electronic copies of all videos produced in discovery, which have been sent via email to Moses_NYSDChambers@nysd.uscourts.gov as directed.

Respectfully Submitted,

Joseph Zangrilli /s/

Joseph Zangrilli
Attorney for Defendants
Senior Counsel
New York City Law Department
100 Church Street
New York, NY 10007
(212) 356-2657
jzangril@law.nyc.gov

Cc: **VIA FIRST CLASS MAIL**
Peter Rodriguez
#22B2287
Wende C.F.
Wende Rd.
PO Box 1187
Alden, NY 14004
Plaintiff Pro Se